

1 Vanessa R. Waldref
2 United States Attorney
3 Eastern District of Washington
4 Brian M. Donovan
5 Assistant United States Attorney
6 Post Office Box 1494
7 Spokane, WA 99210-1494
8 Telephone: (509) 353-2767
9

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF WASHINGTON
12

13 UNITED STATES OF AMERICA,
14

15 Plaintiff,
16

17 vs.
18

19 VERIFIED COMPLAINT FOR
20 FORFEITURE *IN REM*
21

22 REAL PROPERTY KNOWN AS 34719 N.
23 ELK-CHATTAROY ROAD, ELK,
24 WASHINGTON, TOGETHER WITH ALL
25 APPURTENANCES, FIXTURES,
26 ATTACHMENTS, AND IMPROVEMENTS
27 THERETO AND THEREUPON; REAL
28 PROPERTY KNOWN AS 3707 E. BAILEY
RD., CHATTAROY, WASHINGTON,
TOGETHER WITH ALL
APPURTENANCES, FIXTURES,
ATTACHMENTS, AND IMPROVEMENTS
THERETO AND THEREUPON; and REAL
PROPERTY KNOWN AS 6409 E. VALLEY
LANE, ELK, WASHINGTON, TOGETHER
WITH ALL APPURTENANCES,
FIXTURES, ATTACHMENTS, AND
IMPROVEMENTS THERETO AND
THEREUPON,

Defendants.

VERIFIED COMPLAINT FOR FORFEITURE *IN REM* 1

1 Plaintiff, United States of America, by its attorneys, Vanessa R. Waldref,
2 United States Attorney for the Eastern District of Washington, and Brian M. Donovan,
3 Assistant United States Attorney, brings this complaint and alleges as follows in
4 accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:
5

6 **I. NATURE OF THE ACTION**

7
8 1. This is an action to forfeit and condemn to the use and benefit of the
9 United States of America the following listed property for violations of Title II of the
10 Controlled Substances Act, 21 U.S.C. § 801 *et seq.*
11

12 **II. THE DEFENDANT(S) IN REM**

13 2. “Defendant Property A” consists of the following property:

14 Real property known as 34719 N. Elk-Chattaroy Road, Elk, Washington,
15 legally described as follows:

16 The South half of the South half of the Northeast Quarter of the
17 Northwest Quarter in Section 33, Township 29 North, Range 44
18 E.W.M.; Excepting therefrom Elk-Chattaroy CPH No 70 on the
19 East; Situated in the County of Spokane, State of Washington.

20 TPN: 49332.9065.

21 Together with all appurtenances, fixtures, attachments and improvements
22 thereto and thereupon.

23 Subject to all easements, restrictions, reservations and covenants of record.

24 3. “Defendant Property B” consists of the following property:

25 Real property known as 3707 E. Bailey Rd., Chattaroy, Washington, legally
26 described as follows:
27
28

1 Lot 6, Block 1, Paradise Pines First Addition, according to plat
2 recorded in Volume 9 of Plats, Page 45, in Spokane County,
3 Washington.

4 TPN: 39271.0306

5 Together with all appurtenances, fixtures, attachments and improvements
6 thereto and thereupon.

7 Subject to all easements, restrictions, reservations and covenants of record.

8 4. "Defendant Property C" consists of the following property:

9
10 Real property known as 6409 E. Valley Lane, Elk, Washington, legally
11 described as follows:

12 Tract F, Short Plat No 78-021, as per plat recorded in Volume 1
13 of Short Plats, Page 30, records of Spokane County; Situate in
14 the County of Spokane, State of Washington.

15 TPN: 39132.9038

16 Together with all appurtenances, fixtures, attachments and improvements
17 thereto and thereupon.

18 Subject to all easements, restrictions, reservations and covenants of record.

19 **III. JURISDICTION AND VENUE**

20 5. Plaintiff brings this action *in rem* in its own right to forfeit and condemn
21 the Defendant Properties. This Court has jurisdiction over an action commenced by
22 the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28
23 U.S.C. § 1355(a).
24

25 6. This Court has *in rem* jurisdiction over the Defendant Properties under 28
26 U.S.C. § 1355(b).
27
28

1 7. Venue is proper in this district pursuant to 28 U.S.C. §1355(b)(1),
2 because the acts or omissions giving rise to the forfeiture occurred in this district.

3
4 **IV. BASIS FOR FORFEITURE**

5 8. Plaintiff repeats and realleges each and every allegation set forth in
6 Paragraphs 1 through 7 above.

7
8 9. The United States alleges that the Defendant Property is liable to
9 condemnation and forfeiture to the United States for its use, in accordance with the
10 provisions of 21 U.S.C. § 881(a)(7), because it constitutes real property, including any
11 right, title, and interest (including any leasehold interest) in the whole of any lot or
12 tract of land and any appurtenances or improvements, which is used, or intended to be
13 used, in any manner or part, to commit, or to facilitate the commission of, violations
14 of the Controlled Substances Act.
15
16

17 **V. FACTS**

18 10. The Defendant Properties were used to facilitate a broad conspiracy to
19 grow and traffic large amounts of marijuana. The Defendant Properties were
20 purchased by members of a drug trafficking organization (DTO) or their nominees,
21 converted to large-scale marijuana grow operations, and subsequently abandoned,
22 following a pattern observed in related investigations in Western Washington and
23 Oklahoma. The use of the Defendant Properties from 2019 to 2021 was part of a large,
24 sophisticated, and complex conspiracy to facilitate the commission of drug trafficking
25
26
27
28

1 in violation of the Controlled Substances Act. In addition to drug trafficking, this
2 conspiracy appears to involve money laundering and labor trafficking.

3
4 11. As detailed herein, the Defendant Properties were used by Liang Chen
5 and his associates to illicitly grow commercial amounts of marijuana. Liang Chen and
6 his associates appear to be part of a well-funded DTO based out of New York, which
7 uses Chinese nationals as labor to tend sophisticated marijuana grow operations. The
8 DTO appears to include stores that legally sell marijuana growing supplies, as well as
9 numerous restaurants across the country that help launder the cash proceeds of the
10 illicit drug trafficking. In investigations Western and Eastern Washington, the DTO
11 purchased multiple properties in a short period of time, converted them to industrial-
12 style marijuana grow operations, imported workers to tend the plants, and then
13 abandoned the whole operation after law enforcement became involved. After the
14 DTO ceased its operations involving the Defendant Properties in Spokane and Stevens
15 Counties, the DTO appears to have continued its operations in Oklahoma, abandoning
16 the Defendant Properties to be used for further illegal activities.

17 Accordingly, the Defendant Properties are subject to forfeiture as property used to
18 commit or facilitate the commission of drug trafficking.

19
20
21 A. Federal Way Police Department Investigates Illegal Marijuana Grow
22 Houses in Western Washington

23
24 12. In early 2018, the Federal Way Police Department (FWPD) began
25 investigating several possible illegal marijuana grow houses after reports from
26
27
28

1 concerned neighbors. The houses were all in the same neighborhood and had all been
2 purchased in the latter half of 2017, two within a week of each other, by different
3 individuals. From outside the properties, FWPDP officers could smell the odor of fresh
4 marijuana and hear fans running inside the houses. Officers observed the electric
5 meters at the houses spinning rapidly, and data from the electric company confirmed
6 the houses were extremely large amounts of power, all consistent with a marijuana
7 grow operation.
8

10 13. During surveillance of the four suspected grow houses, the FWPDP
11 identified a fifth suspected grow house in the city at 720 SW 327th Street. The house
12 had been purchased by Liang Chen in January 2017; two minivans registered to Liang
13 Chen were also among the vehicles observed traveling between the suspected grow
14 houses. FWPDP officers could smell fresh marijuana from outside the house and saw
15 the electric meter spinning rapidly. A neighbor reported hearing the sound of loud fans
16 and seeing a number of people coming and going from the house, although it did not
17 appear that anyone lived at the property.
18
19
20

21 14. None of the five houses were licensed with the Washington State Liquor
22 and Cannabis Board (LCB); thus, any marijuana grow operations were illegal. On
23 June 5, 2018, the FWPDP executed search warrants at the five suspected grow houses
24 and an associated apartment unit. The searches confirmed that the houses were being
25 used to illegally grow large amounts of marijuana. The living spaces had been
26 converted to grow rooms and processing rooms, with small areas carved out for
27
28 VERIFIED COMPLAINT FOR FORFEITURE *IN REM* 6

1 sleeping quarters. In total, FWPD seized nearly 4,000 live marijuana plants and 25
2 bags of processed marijuana from the five houses.

3
4 15. FWPD also located 11 individuals, two of whom had only arrived days
5 before. Although FWPD officers were unable to interview several individuals due to a
6 language barrier or apparent confusion about their rights, two admitted being paid in
7 cash to tend the grow operations. One reported that he thought the activity was legal
8 because marijuana was legal in the state. The other explained that his mother and
9 father were involved and that he had been growing for about two months. His mother,
10 Meihua Chen, was the record owner of one of the grow houses. When interviewed,
11 she told officers her husband grew marijuana because he was sick and did not get paid
12 for growing it. She claimed that the more than \$6,000 in cash FWPD found during the
13 search of her apartment was winnings from a casino. Another individual, Bo Lin, told
14 FWPD he owned a sushi restaurant in Oklahoma and came to Washington to start
15 another restaurant. He denied involvement in the grow operation and told officers he
16 only visited the grow houses because he was offered meals by the people who lived
17 there.

18
19 16. At 720 SW 327th St., FWPD officers arrested Meiying Lin and Zhiqin
20 Chen. In addition to approximately 1,400 marijuana plants, \$2,262 in U.S. Currency,
21 and various documents demonstrating the involvement of Liang Chen, Zhiqin Chen,
22 and Meiying Lin, officers located a mortgage statement addressed to Zhiqin Chen at
23 30009 8th Ave. S, Federal Way, Washington. Public records showed Zhiqin Chen and
24
25
26
27
28
VERIFIED COMPLAINT FOR FORFEITURE *IN REM* 7

1 Meiying Lin purchased 30009 8th Ave. S on August 25, 2017, in the same time frame
2 the other grow houses had been purchased. FWPD had previously received a report
3 from a neighbor that 30009 8th Ave. S might contain a marijuana grow operation.
4

5 17. Two days after executing the warrants, FWPD officers returned to
6 Meihua Chen's apartment and contacted her outside. She was with another woman
7 who identified herself as Lan Qiu Ye. Lan Qiu Ye told officers Liang Chen was her
8 husband and that they resided together in another unit in the same apartment complex.
9
10 Lan Qiu Ye told officers her husband also owned a house in addition to the apartment
11 they rented.
12

13 18. When FWPD officers visited 30009 8th Ave. S., they observed its
14 electric meter was rotating rapidly, consistent with high power usage. During
15 surveillance, they observed Liang Chen and Lan Qiu Ye park a minivan, previously
16 observed during surveillance of the other grow houses, partially in the garage at the
17 residence and load something into the rear of the minivan. The minivan was registered
18 to Liang Chen at an apartment in the complex where FWPD had contacted Lan Qui
19 Ye.
20
21

22 19. On July 27, 2018, FWPD executed a search warrant at 30009 8th Ave. S.
23
24 The residence was unoccupied, but had been converted to a marijuana grow, with a
25 part of the living room set up as a sleeping area. Officers located approximately 700
26 live marijuana plants and 100 marijuana plants arranged on drying racks. Documents
27 in the garage belonged to Zhiqin Chen. Officers located Liang Chen at his apartment
28
VERIFIED COMPLAINT FOR FORFEITURE *IN REM* 8

1 and arrested him, finding \$507 in U.S. Currency in his wallet. They also arrested Lan
2 Qiu Ye, who denied having knowledge of the grow operation despite admitting she
3 had been to the house at 30009 8th Ave. S.
4

5 20. The Federal Way investigation did not result in any prosecutions;
6 however, the DTO appeared to abandon its operation in the city. In 2019, three of the
7 grow houses were sold by their record owners, who did not appear to have been
8 actively involved in the grow operation in Federal Way. The three houses that were
9 owned by Meihua Chen, Zhiqin Chen and Meiyong Lin, and Liang Chen, who were all
10 arrested during the investigation, were later judicially forfeited by the City of Federal
11 Way in King County Superior Court and sold to various buyers in 2020.
12

13 21. Later investigation revealed that a number of the Federal Way
14 conspirators, including Liang Chen, Lan Qiu Ye, and Meihua Chen, opened accounts
15 at Key Bank in late 2017 and 2018 using small amounts of cash. The accounts were
16 later funded by large cash deposits by non-account holders in the Cincinnati, Ohio
17 region, many of which the banks recorded as smelling of marijuana. For example, the
18 only deposits in Lan Qiu Ye's account were two cash deposits totaling \$17,600, made
19 on the same day by the same person in Ohio. The cash was then withdrawn in
20 Washington in a series of three large transactions over the next two weeks. Liang
21 Chen's account received two cash deposits totaling \$14,000 a day apart from Ohio;
22 the cash was withdrawn in Washington over the next week in a series of five
23 transactions. Notably, the three people identified as making the cash deposits in Ohio
24
25
26
27
28
VERIFIED COMPLAINT FOR FORFEITURE *IN REM* 9

1 were not Chinese, suggesting they may be customers buying the DTO's illegal
2 marijuana.

3 B. Washington State Patrol Investigates Illegal Marijuana Grow Houses in
4 Eastern Washington

5 22. On April 11, 2019, the Washington State Patrol stopped a vehicle in
6 Kittitas County for driving with expired registration, which led to the discovery of
7 \$57,100 in U.S. currency and 2.2 pounds of marijuana, as well as materials common
8 to illegal marijuana grow operations. The driver, Li Fa Zhu, told officers he was in
9 Washington visiting 34719 N. Elk-Chattaroy Road in Spokane County (Defendant
10 Property A), and that he worked for a Chinese restaurant in Spokane. He presented a
11 Pennsylvania driver's license, but conversations with Li Fa Zhu, other documents in
12 the vehicle, and later online searches suggested he actually resided in New York City,
13 possibly at 30 Monroe Street, Apt. J6.
14

15 23. The vehicle Li Fa Zhu was driving had been recently purchased and was
16 registered to Sau Lam at Defendant Property A. Sau Lam's address history also
17 included apartment J6 at 30 Monroe Street in New York. In 2018, Wells Fargo Bank
18 had previously identified suspicious activity indicative of money laundering in Sau
19 Lam's account, including cash deposits by Sau Lam in New York, a series of large
20 money order deposits by Li Fa Zhu in Spokane, and subsequent cash withdrawals by
21 Sau Lam in New York.
22
23
24
25
26
27
28

1 24. Documents in the vehicle also included electrical bills showing extremely
2 high power usage at Defendant Property A. The county assessor describes Defendant
3 Property A as a 9.78 acre parcel consisting of a singlewide 988 sq. ft. mobile home
4 and one carport. In 2016, the property had been purchased for \$93,000, in what
5 appeared to be a cash transaction, by Mei Ying Kwok and Kit Fong Chen, whose
6 address was listed at 162 Henry Street, Apartment 5, New York, New York. In 2018,
7 both Mei Ying Kwok and Kit Fong Chen had quitclaimed their respective interests to
8 Ping Qiang Chen for no monetary consideration; at the time, both Mei Ying Kwok
9 and Ping Qiang Chen listed their respective addresses as 30 Monroe Street, Apt. J6,
10 the same address associated with Li Fa Zhu and Sau Lam. Immigration records
11 showed Mei Ying Kwok was Sau Lam's mother and Kit Fong Chen was Sau Lam's
12 daughter.
13

14 25. Li Fa Zhu had listed Defendant Property A as his mailing address for an
15 account with Chase Bank. His financial history showed a pattern of large cash
16 deposits in New York, Washington, and San Francisco, with the currency being noted
17 as smelling of marijuana at the time of deposit.
18

19 26. Documents in the vehicle indicated that Li Fa Zhu visited a casino in
20 Spokane County. WSP contacted the casino as part of its investigation, and the casino
21 reported that it was investigating Li Fa Zhu for money laundering and was preparing
22 to ban him from the casino. On multiple occasions, Li Fa Zhu had converted large
23 amounts of cash to casino chips, spent a very short time placing low-value bets, and
24
25
26
27
28
VERIFIED COMPLAINT FOR FORFEITURE *IN REM* 11

1 then cashed out his chips for a similar amount of cash as he originally spent. On July
2 22, 2019, the casino informed WSP that Li Fa Zhu had visited the casino with another
3 man in a 2013 Ford Focus registered to Liang Chen. WSP observed the same 2013
4 Ford Focus and a 2002 Toyota Tundra registered to Liang Chen travel to Defendant
5 Property A on multiple occasions. On investigation into Liang Chen, WSP discovered
6 the recent investigation in Federal Way and confirmed it was dealing with the same
7 Liang Chen.
8

10 27. Based on their investigation following the traffic stop of Li Fa Zhu, WSP
11 obtained and executed a search warrant at Defendant Property A on January 29, 2020.
12 The property's marijuana grow operation consisted of three active and one non-active
13 marijuana grow rooms inside the mobile home, two shed-type structures, and six
14 modified 40' metal shipping containers which formed two larger structures. All
15 structures were found to be in active production of marijuana, using an extensive array
16 of grow lights with ballasts, fans, propane heaters and hydroponic grow equipment,
17 which investigators described as the best that could be bought. All grow locations
18 searched were constructed similarly. WSP seized 1,962 plants totaling 880 pounds at
19 Defendant Property A. WSP discovered a mountain of old potting soil near the
20 shipping containers and marijuana shake and stems stripped of marijuana buds,
21 indicating there were several years of previous marijuana grows.
22

26 28. During the search, WSP officers contacted the driver and passenger of a
27 van that had previously been observed at the property, which had distinctive writing
28
VERIFIED COMPLAINT FOR FORFEITURE *IN REM* 12

1 identifying it as belonging to a church in New York City. The occupants were
2 identified as Si Wei Zhang and Ping Yong Zhu by their New York State identification
3 cards. Ping Yong Zhu had \$1,980 in U.S. Currency in his pocket. They gave
4 conflicting stories about who owned the van, but both advised they had come from
5 New York in the van about one month previously and were being paid \$200 a day to
6 do remodeling at Defendant Property A. WSP, however, had seen the van at the
7 property more than two months previously, and Li Fa Zhu denied paying either man
8 money for remodeling. Among Pin Yong Zhu's belongings were a receipt from a
9 marijuana growing supply store in Seattle, Affordable Indoor Gardening Supplies, or
10 AIGS. Receipts from the same store had been found in the Federal Way investigation
11 and in Li Fa Zhu's vehicle during WSP's initial traffic stop in April 2019. WSP also
12 located bank receipts belong to Si Wei Zhang showing large, even-dollar transactions
13 associated with multiple bank accounts.

18 29. After WSP executed its search warrant at Defendant Property A, a
19 neighbor reached out to WSP with more information about Li Fa Zhu. The neighbor
20 plowed snow for Li Fa Zhu and was aware of the marijuana grow operation. He had
21 previously reported the operation to local law enforcement but received no response.
22 The neighbor also plowed snow for several of Li Fa Zhu's associates and reported that
23 each was growing marijuana like Li Fa Zhu. The neighbor's brother-in-law was an
24 electrician and had done electrical work at some of the properties.
25
26
27
28

1 30. WSP interviewed the electrician, who reported he was currently working
2 on installing new 400-amp service to a new-construction shop at 3707 E. Bailey Road,
3 Chattaroy, Spokane County, Washington (Defendant Property B). The property had
4 been purchased by Liang Chen for \$150,000 in cash on January 16, 2020, via wired
5 funds from Chen's Bank of America account. The assessor described the property as
6 consisting of 9.17 acres, with one doublewide mobile home of 1478 sq. ft., a 600 sq.
7 ft. barn and two 300 sq. ft. lean-to structures. The two newly constructed buildings
8 were estimated at over 1,000 sq. ft. each. When shown a photograph, the electrician
9 confirmed he had been dealing with the same Liang Chen as had been arrested in
10 Federal Way. When the electrician had gone inside the residence to speak to Liang
11 Chen, he could smell the odor of marijuana. Power company records showed that the
12 residence at Defendant Property B used approximately 10 times the amount of power
13 of an average Washington residence and the newly built shops were using
14 approximately 20 times the amount of power of an average Washington residence.
15
16
17
18
19

20 31. The neighbor directed WSP to 15606 E. Nelson Road, Elk, Spokane
21 County, Washington, where he had plowed snow. He had seen the New York church
22 van parked at the property overnight and had seen marijuana leaves on the ground at
23 the property. His brother-in-law had spoken with Liang Chen at the property in
24 August 2019 about installing 400-amp service on a newly built pole building, but the
25 job never materialized. The electric company, however, confirmed that new 400-amp
26 service had been installed on the shop in November 2019. The company later had to
27
28
VERIFIED COMPLAINT FOR FORFEITURE *IN REM* 14

1 upgrade its transformer servicing the location due the amount of power consumption.
2 The property at 15606 E. Nelson Road had been purchased for \$177,500 in cash in
3 August 2019 by a corporation using a mailing address in Brooklyn, New York.¹
4

5 32. The neighbor also directed WSP to 715 W. Lone Pine Lane, Deer Park,
6 Spokane County, Washington. He had not seen marijuana being grown at the
7 property, but Qiao Qiao Zhu, who identified herself as Li Fa Zhu's daughter, had told
8 the neighbor they had planted seeds and were growing marijuana. The electrician had
9 installed a new 400-amp service at the property in the fall of 2019 in preparation for
10 the construction of a new shop building. Qiao Qiao Zhu had purchased the property on
11 November 7, 2019. Power company records showed that in January, Qiao Qiao Zhu
12 had paid a \$2,750 deposit for a transformer upgrade in cash; her mailing address on
13 the account was a residence in Tulsa, Oklahoma. According to the power company's
14 records, Ping Qiang Chen, the record owner of Defendant Property A, had
15 accompanied Qiao Qiao Zhu to the power company's office to make the payment for
16 the deposit. Between the house and the new shop, the property used almost 40 times
17 the amount of power for an average Washington residence. Surveillance of the
18
19
20
21
22
23
24
25
26

27 ¹ The real property located at 15606 E. Nelson Road was subsequently sold by the
28 corporation and purchased by an innocent, unaffiliated third-party in December 2021.
VERIFIED COMPLAINT FOR FORFEITURE *IN REM* 15

1 property showed stacks of black plastic plant pots consistent with those used to grow
2 marijuana.²

3
4 33. The neighbor reported visiting 4112 Lumberg Road, Springdale, Stevens
5 County, Washington, to help his brother-in-law install new 400-amp electrical service.
6 A California-based LLC had purchased the property in December 2019 for \$120,000.
7 The electrician reported that before the service was upgraded, the residents had used
8 so much power they burned the power lines in half between the power pole and the
9 residence. The neighbor reported seeing Liang Chen at the residence at that time, and
10 the electrician confirmed that Liang Chen was the client he was dealing with. The
11 subscriber information for the power company was “Lin Lian Cheng,” which appeared
12 to be a fictitious identity. The phone number for Lin Lian Cheng was associated with
13 Liang Chen’s wife, Lan Qiu Ye.³

14
15
16
17 34. The neighbor at Defendant Property A reported plowing snow at 6409 E.
18 Valley Lane, Elk, Spokane County, Washington (Defendant Property C), and seeing
19 fresh marijuana leaves and smelling the odor of marijuana on the property. His
20 brother-in-law, the electrician, had not visited the property. The assessor described the
21 property as consisting of 5.04 acres, with one doublewide mobile home of 1,152 sq. ft.
22
23
24

25 ² The real property located at 715 W. Lone Pine Lane was subsequently sold by Qiao
26 Qiao Zhu and purchased by an innocent, unaffiliated third-party in February 2021. See
27 *infra* ¶ 46.

28 ³ As of January 2024, the record owner of the real property located at 4112 Lumberg
Road is the same California-based LLC.

1 and an 864 sq. ft. pole barn. On June 25, 2019, Yong Cong Wu had purchased the
2 property for \$179,000, in what appeared to be a cash transaction, but beginning July
3 2019, the power bill was in the name of John Chen, an alias used by Liang Chen in the
4 Federal Way investigation, with the same listed date of birth as Liang Chen. The
5 property had separate electric meters for the house and a shop, and between the two it
6 used almost 40 times the average amount of electricity for a Washington residence.
7

8
9 35. Yong Cong Wu had previously been licensed by the Washington State
10 Liquor and Cannabis Board to grow up to sixty marijuana plants at 10623 Renton
11 Avenue S., Seattle, down the street from the listed address for AIGS at 11823 Renton
12 Ave. S. “Affordable Indoor Gardening Supplies, LLC” had been formed in
13 Washington in 2015 with a physical address of 11823 Renton Ave. S. in Seattle; Yong
14 Wu was listed as the governor with an address at 10621 Renton Avenue S. The AIGS
15 location was in the same building as a business named “Roman Casino.” Business
16 cards for Roman Casino were found in documents belonging to Liang Chen in Federal
17 Way and among Li Fa Zhu’s belongings in the residence at Defendant Property A.
18

19
20 36. During surveillance of Liang Chen, WSP observed him travel to 1786
21 Blue Creek Road W, Addy, in Stevens County, Washington. The property had been
22 purchased by Lan Qui Ye on November 4, 2019, and two large outbuildings appeared
23 to be newly constructed. The utilities were registered under “James Brown,” which
24 appeared to be a fictitious identity, and the property used more than 30 times the
25 amount of power of an average Washington residence. Surveillance showed piles of
26
27
28 VERIFIED COMPLAINT FOR FORFEITURE *IN REM* 17

1 what appeared to be old potting soil behind the outbuildings, like had been found at
2 Defendant Property A. Neither the neighbor at Defendant Property A nor his brother-
3 in-law were aware of the property.⁴
4

5 37. None of the properties were licensed with the LCB. On May 4, 2020,
6 WSP executed search warrants at the six newly discovered grow operations, as well as
7 an apartment in Deer Park, Washington, rented by Liang Chen and Lan Qiu Ye. In
8 total, WSP located approximately 9,000 live marijuana plants and large amounts of
9 U.S. currency. More than \$87,000 in U.S. currency was found in the apartment rented
10 by Liang Chen and Lan Qiu Ye. At Defendant Property B, WSP located more than
11 1,500 live marijuana plants and \$2,644 in U.S. currency. At Defendant Property C,
12 they located almost 1,100 live marijuana plants as well as bins and vacuum bags of
13 processed marijuana. At several of the locations, Chinese nationals were found
14 tending the grow operation. Zhiquin Chen and Meiying Lin, who were arrested in the
15 Federal Way investigation and owned one of the grow houses, were located at 4112
16 Lumberg Road. Si Wei Zhang and Ping Yong Zhu, who were contacted during the
17 search of Defendant Property A, were located at 15606 E. Nelson, where a large
18 accessory structure was under construction.
19
20
21
22
23
24
25
26

27 ⁴ In January 2021, the structures at 1786 Blue Creek Road were destroyed in a fire.
28 *See infra* ¶ 45. The real property was subsequently sold by Lan Qui Ye and purchased
by an innocent, unaffiliated third-party in April 2022.

1 38. In June 2020, a person using a New York area phone number called the
2 Grant County Sheriff's Office to report an illegal grow operation. Due to a language
3 barrier, Grant County was unable to get complete information, but it sent the tip to
4 WSP. An employee of WSP fluent in Mandarin was able to speak further with the
5 caller, who reported that there were over 2,000 marijuana plants growing at Defendant
6 Property A which were almost ready for harvest. The caller reported that Liang Chen
7 was the boss and operated multiple grow operations, although the caller did not know
8 the addresses for the others. WSP contacted neighbors of Defendant Property A, who
9 reported smelling fresh marijuana at night. Power company records confirmed that,
10 although electricity usage at the property dropped in the months following the
11 execution of the search warrant, it rose again beginning with the May billing cycle to
12 levels consistent with industrial marijuana cultivation.

13 39. During surveillance of Liang Chen's apartment later that month, WSP
14 detectives observed Liang Chen arrived in a rented car. When they contacted the
15 rental company, they learned that Liang Chen was renting the vehicle for a month and
16 had given his address as his previous apartment in Federal Way. Liang Chen had
17 previously rented vehicles from the company in August and November 2019 and in
18 January and May 2020. WSP also observed Liang Chen loading a rented U-Haul box
19 truck at the apartment. A neighbor told WSP he observed similar moving vans at the
20 apartment on a regular basis and thought it was odd that no one ever moved out or in.
21 Eventually, the U-Haul truck left the apartment and Liang Chen followed in the rental
22
23
24
25
26
27
28
VERIFIED COMPLAINT FOR FORFEITURE *IN REM* 19

1 car. WSP detectives followed until Liang Chen conducted a heat check to see if he
2 was being followed by law enforcement. It appeared that the vehicles were heading
3 toward 4112 Lumberg Road, however, and WSP later confirmed that the U-Haul truck
4 was parked at the residence.
5

6 40. It appeared to WSP that the DTO was utilizing rental vehicles to
7 transport illegal marijuana so that if they were apprehended, they would not lose their
8 personal vehicles. It also appeared that they were utilizing the box trucks to transport
9 their marijuana after harvesting, as WSP had not located processing areas during their
10 searches of the grow houses.
11
12

13 41. Power company records indicated that the DTO had resumed grow
14 operations at Defendant Property B, Defendant Property C, 1786 Blue Creek Road,
15 and 4112 Lumberg Road. The power company had turned off the electricity to the
16 property at 15606 E. Nelson Road after WSP executed its search warrant. The DTO
17 did not appear to be utilizing 715 W. Lone Pine Road any longer.
18
19

20 42. In November 2020, Yong Cong Wu sold Defendant Property C to Zhiqin
21 Chen for \$180,000 in cash via a wire transaction from Chen's Key Bank account.
22 Yong Cong Wu's listed address was 10621 Renton Ave. S., Seattle, Washington, next
23 door to the address at which he had previously licensed a small marijuana grow
24 operation and at the same address listed for Yong Wu, governor of Affordable Indoor
25 Gardening Supplies, LLC.
26
27
28

1 43. In December 2020, WSP obtained a tracker warrant for a vehicle newly
2 purchased by Sau Lam and registered at Defendant Property A. GPS information
3 showed that the vehicle made numerous trips to the grow properties, including to
4 15606 E. Nelson Road after the power had been turned off. It also made numerous
5 trips to hydroponic supply stores in Spokane Valley and Federal Way. The vehicle
6 also repeatedly visited Canaan Buffet, a restaurant in north Spokane County, often for
7 just a few minutes. On multiple occasions, the vehicle parked behind the restaurant
8 rather than in customer parking areas. Notably, Canaan Buffet had once paid the
9 power bill for Defendant Property A, in March 2019. The vehicle also visited multiple
10 casinos, including the location of the Roman Casino and AIGS store in Seattle.

14 C. Drug Enforcement Administration Investigates Marijuana Drug
15 Trafficking Organization's Nationwide Ties and Money Laundering
16 Activity

17 44. In December 2020, the United States Drug Enforcement Administration
18 (DEA) adopted the case from WSP. The case was subsequently adopted by the
19 Organized Crime Drug Enforcement Task Force (OCDETF).

21 45. On January 31, 2021, the residence and outbuildings at 1786 Blue Creek
22 Road were destroyed in a structure fire. When a sheriff's deputy responded to the
23 active fire, he located two people in the residence he recognized as Chinese nationals
24 from when he participated in the execution of the search warrant. They repeatedly
25 attempted to reenter the residence, requiring the deputy to detain them in his patrol car
26 to stop them running back into the burning building. Notably, the electrical service
27
28

1 had not been upgraded at the property, and the fire was likely caused by the illegal
2 grow operation.

3
4 46. In February 2021, Qiao Qiao Zhu sold the property at 715 W. Lone Pine
5 Road to an apparently uninvolved party.

6 47. On February 18, 2021, DEA agents observed a minivan travel to
7 Defendant Property C, then to Defendant Property B. The same minivan was observed
8 multiple times via electronic surveillance traveling to the two properties. The minivan
9 was registered to Bo Ye at an apartment in Spokane County. Bo Ye was present at
10 Liang Chen and Lan Qiu Ye's apartment when WSP executed its warrant in April
11 2020 and, according to immigration records, is Lan Qiu Ye's brother and Liang
12 Chen's brother-in-law.

13
14
15 48. On March 15, 2021, Bo Ye was stopped in Dickinson County, Kansas,
16 for following too closely behind a semi-truck. Bo Ye was driving a Honda CR-V
17 bearing Washington license plates. Bo Ye told deputies he had been visiting a friend
18 in Kansas City and had previously worked in Tulsa, Oklahoma as a chef. After a
19 certified drug detection K-9 alerted on the car, deputies conducted a search and
20 located several bundles of U.S. currency in \$50 and \$100 bills, totaling approximately
21 \$30,000, and a number of handwritten checks in amounts from \$2,500 to \$3,500. Bo
22 Ye initially denied knowledge of the money, but later told deputies he had received
23 the money from friends to buy a house, and then later said he had saved the money
24 from tips over the past three months. Bo Ye gave deputies permission to search his
25
26
27
28
VERIFIED COMPLAINT FOR FORFEITURE *IN REM* 22

1 cell phone, where they located photos of large amounts of marijuana in various stages
2 of growth and harvest, photos of invoices for marijuana growing equipment, and
3 photos of W-2 forms and handwritten paychecks. Bo Ye claimed the photos involving
4 marijuana had been sent to him by a friend.
5

6 49. DEA later examined the invoice photos. Metadata showed the photos had
7 been taken by Bo Ye's phone rather than sent to him. The invoices were from a store
8 in Southern California, dated November 16, 2020, and totaled more than \$92,000.
9 They documented the purchase of concentrated fertilizers and specialized equipment
10 specific to maximizing bud growth and yields of marijuana production, as well as
11 quantities of 2,000 each of multiple sizes of plant pots.
12

13 50. DEA also later investigated the employers listed on Bo Ye's W-2 forms
14 and paychecks. In total, Bo Ye received payment from nine different restaurants in
15 eight different states between 2020 and 2021. Based on its investigation, DEA
16 suspected that Bo Ye acted as a courier for the illicit proceeds of the marijuana grow
17 operation, taking cash to various restaurants and receiving the handwritten paychecks
18 in exchange. Four of the restaurants, across three states, were owned by Li Ming
19 Zhang. Bo Ye's phone also had a picture of a house in Oklahoma City owned by Li
20 Ming Zhang's sister, Xiu Fang Zhang. Li Ming Zhang and Xiu Fang Zhang had each
21 been flagged by casinos for suspicious activity indicative of money laundering. Li
22 Ming Zhang had also been flagged by two different banks for suspicious deposits
23 indicative of money laundering.
24
25
26
27
28

1 51. DEA investigated the address in Tulsa, Oklahoma, that Qiao Qiao Zhu
2 had provided to the power company for the account at 715 W. Lone Pine Lane. The
3 registered owner of the property in Tulsa was Wen Jing Zhu. Wen Jing Zhu was also
4 the registered owner of a property in Terlton, Oklahoma, which she had purchased in
5 July 2020. The Terlton property was similar to the grow operations in Spokane and
6 Stevens Counties in that it was rural with acreage and included significant shop square
7 footage. After purchasing the properties, Wen Jing Zhu installed two additional
8 electric meters to serve the property. Since Wen Jing Zhu's purchase of the property,
9 it had used from 6 to 60 times as much power as comparable months before the
10 purchase. From July 30, 2020 to March 5, 2021, the electric bills at the property
11 totaled approximately \$98,700, which was all paid in cash by Wen Jing Zhu, Qiao
12 Qiao Zhu, or known associates. The payments were distributed in a way that appeared
13 to be an effort to structure and avoid reporting requirements of large cash payments.

18 52. In April 2021, task force agents (TFAs) confirmed the smell of fresh
19 marijuana and the sound of fans running at Defendant Property B and Defendant
20 Property C from the perimeter of the properties. They also visited Defendant Property
21 A and 15606 E. Nelson Road. No activity was observed at any of the four properties.
22 Electronic surveillance on April 23, 2021, however, showed a light-colored sedan
23 arrive at Defendant Property B in the afternoon. Liang Chen then drove the minivan
24 registered to Bo Ye from Defendant Property B to Defendant Property C. After
25 several hours, the minivan returned to Defendant Property B and later left the property
26
27
28
VERIFIED COMPLAINT FOR FORFEITURE *IN REM* 24

late at night, followed by the sedan. On April 26, the same minivan and a silver sedan registered to Liang Chen were seen at Defendant Property C for several hours.

53. In June 2021, a neighbor of Defendant Property C filed a complaint with the Spokane County Sheriff's Office stating that, based on the strong odor of marijuana, he suspected the house was being used to grow marijuana again after the raid the previous year. The neighbor reported that Yong Cong Wu, the previous record owner of the property, was there most often but did not appear to live there full time.

54. Between 2021 and 2022, however, the DTO appeared to abandon its Spokane-area operations. The last observed activity was at Defendant Property A in June 2022. DEA intelligence suggested the DTO had moved its operations to Oklahoma.

D. Ongoing illegal activity at the abandoned Defendant Properties.

55. In late 2023, the Defendant Properties were used in what appears to be an unrelated scheme of forgery and fraudulent conveyances.

56. On October 23, 2023, a quit claim deed was recorded purporting to convey Defendant Property B from Liang Chen to a "Joseph M. Lavigne" as a gift. The deed was dated April 20, 2019—almost a year before Liang Chen purchased the property. The purported signature of Liang Chen does not match those found on other official documents. A Joseph M. Lavigne has numerous convictions out of Spokane County Superior Court, including for forgery and money laundering. He appears to have entered into a sales contract with a real estate wholesaler based in Western

1 Washington, which recorded an affidavit documenting the contract on November 27,
2 2023.

3
4 57. On December 22, 2023, two general warranty deeds were recorded,
5 respectively purporting to convey Defendant Property A from Ping Qiang Chen to a
6 “Carly Lauren DePlonty Owsiak” and Defendant Property C from Zhiqin Chen to a
7 “Benjamin James Hill,” both purportedly as gifts. Both listed the date of sale as more
8 than a year earlier, on June 16, 2022. A Benjamin J. Hill has numerous convictions
9 out of Spokane County Superior Court, including for forgery. He currently has
10 pending felony charges for possession of a stolen motor vehicle and possession of a
11 controlled substance with intent to deliver; the statement of facts in that case identifies
12 Carly Owsiak as his girlfriend.

13 14 15 16 **VI. CONCLUSION**

17
18 Based on the foregoing, the United States alleges that the Defendant Property is
19 subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(7) because it
20 is real property which was used or intended to be used, in any manner or part, to
21 commit, or to facilitate the commission of the Controlled Substances Act.
22

23 WHEREFORE, the United States of America requests that notice of this action
24 be given to all persons who reasonably appear to be potential claimants of interests in
25 the property; that the Defendant Property be forfeited and condemned to the United
26
27
28

1 States of America; that the plaintiff be awarded its costs and disbursements in this
2 action and for such other and further relief as this Court deems proper and just.

3
4 DATED this 25th day of January 2024.

5 Vanessa R. Waldref
6 United States Attorney

7
8 s/ Brian M. Donovan
9 Brian M. Donovan
Assistant United States Attorney


10
11
12 VERIFICATION

13
14 I, Drew Rodman, hereby verify and declare under penalty of perjury that I am a
15 Special Agent with the Drug Enforcement Administration, in Spokane, Washington,
16 that I have read the foregoing Verified Complaint *in rem* and know the contents
17 thereof, and that the matters contained in the Verified Complaint are true to my own
18 knowledge, except that those matters herein stated to be alleged on information and
19 belief and as to those matters, I believe them to be true.
20

21
22 The sources of my knowledge and information and the grounds of my belief are
23 the official files and records of the United States, information supplied to me by other
24 law enforcement officers, as well as my investigation of this case, together with
25 others, as a Special Agent.
26

1 I hereby verify and declare under penalty of perjury that the foregoing
2 information is true and correct.

3
4 DATED this 25 day of January 2024.

5
6 
7 Drew Rodman
8 Special Agent, Drug Enforcement Administration
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28